



## **PRIVACY THRESHOLD ANALYSIS (PTA)**

**This form is used to determine whether  
a Privacy Impact Assessment is required.**

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PTA to the DHS Privacy Office:

Rebecca J. Richards  
Senior Director of Privacy Compliance  
The Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
Tel: 202-343-1717

PIA@dhs.gov

Upon receipt from your component Privacy Office, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, [www.dhs.gov/privacy](http://www.dhs.gov/privacy), on DHSConnect and directly from the DHS Privacy Office via email: [pia@dhs.gov](mailto:pia@dhs.gov), phone: 202-343-1717.



## PRIVACY THRESHOLD ANALYSIS (PTA)

### SUMMARY INFORMATION

<b>Project or Program Name:</b>	<b>Chemical Facility Anti-Terrorism Standards (CFATS) Program Information Collections</b>		
<b>Component:</b>	National Protection and Programs Directorate (NPPD)	<b>Office or Program:</b>	Infrastructure Security Compliance Division (ISCD)
<b>TAFISMA Name:</b>	Click here to enter text.	<b>TAFISMA Number:</b>	Click here to enter text.
<b>Type of Project or Program:</b>	Form or other Information Collection	<b>Project or program status:</b>	Update

### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Dave Wulf		
<b>Office:</b>	NPPD/IP/ISCD	<b>Title:</b>	Division Director
<b>Phone:</b>	703-603-4778	<b>Email:</b>	Dave.Wulf@hq.dhs.gov

### INFORMATION SYSTEM SECURITY OFFICER (ISSO)

<b>Name:</b>	Greta Gosch		
<b>Phone:</b>	703-235-8237	<b>Email:</b>	Greta.Gosch@hq.dhs.gov

### ROUTING INFORMATION

<b>Date submitted to Component Privacy Office:</b>	October 26, 2012
<b>Date submitted to DHS Privacy Office:</b>	October 29, 2012
<b>Date approved by DHS Privacy Office:</b>	Click here to enter a date.



## SPECIFIC PTA QUESTIONS

### **1. Please describe the purpose of the project or program:**

*Please provide a general description of the project and its purpose in a way a non-technical person could understand.*

Section 550 of the Department of Homeland Security Appropriations Act of 2007, Pub. L. No. 109-295 authorizes DHS to regulate the security of high-risk chemical facilities. The National Protection and Programs Directorate (NPPD), Office of Infrastructure Protection (IP), Infrastructure Security Compliance Division (ISCD) implements this statutory authority through the Chemical Facility Anti-Terrorism Standards (CFATS) regulations, 6 CFR Part 27. CFATS establishes a risk-based approach to identifying and securing chemical facilities determined by NPPD to be “high-risk.” CFATS provides DHS with authorization to obtain information from high-risk facilities to support the implementation of CFATS.

The purpose of this PTA is to provide updated information regarding the three CFATS collections being submitted to the Office of Management and Budget (OMB) for approval.

As background:

The Paperwork Reduction Act (PRA) requires prior approval from OMB on how NPPD proposes to collect the necessary information for program implementation by affected facilities. NPPD uses three Information Collection Requests (ICRs) to gather information from chemical facilities in order to implement CFATS as follows:

- OMB Collection #1670-0007 supports the Department’s requirements under CFATS to collect the primary core regulatory data electronically through the Chemical Security Assessment Tool (CSAT). This is an ICR for Renewal (revision with change of a currently approved collection), which includes the following changes: (1) Removal of the Chemical-terrorism Vulnerability Information (CVI) Authorization Instrument; (2) Addition of the Request to Improve Program Instrument; (3) Inclusion of Recordkeeping burden for the first time; and (4) Reduction of the Burden Estimate by \$44 million, which is based upon actual historical data collected between January 2009 and December 2011.
- OMB Collection #1670-0014 supports the Department’s requirements to manage the CFATS program. This is an ICR for Extension (revision without change of a currently approved collection). Although the collection hasn’t changed, there is a reduction of the Burden Estimate by \$150,000, which is based upon actual historical data collected between January 2009 and December 2011.
- OMB Collection #1670-0015 supports the Department’s requirements to manage the CVI program in support of CFATS. This is an ICR for Extension (revision without change of a currently approved collection). Although the collection hasn’t changed, there is an increase of the Burden Estimate by \$2,500, which is based upon actual historical data collected between January 2009 and December 2011.

The current Information Collections (ICs) expire on March 31, 2013. Failure to obtain OMB approval to revise these ICs will result in NPPD being unable to collect vital information from our stakeholders.



<b>2. Project or Program status</b>		Update	
<b>Date first developed:</b>	<b>March 27, 2007</b>	<b>Pilot launch date:</b>	Click here to enter a date.
<b>Date last updated:</b>	<b>July 26, 2012</b>	<b>Pilot end date:</b>	Click here to enter a date.

<p><b>3. From whom does the Project or Program collect, maintain, use or disseminate information?</b> <i>Please check all that apply.</i></p>	<p><input checked="" type="checkbox"/> DHS Employees</p> <p><input checked="" type="checkbox"/> Contractors working on behalf of DHS</p> <p><input checked="" type="checkbox"/> Members of the public</p> <p><input type="checkbox"/> This program does not collect any personally identifiable information<sup>1</sup></p>
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<p><b>4. What specific information about individuals could be collected, generated or retained?</b> <i>Please provide a specific description of information that might be collected, generated or retained such as names, addresses, emails, etc.</i></p>
<p>Since the existing PIA was published on July 26, 2012, no new data elements are being collected.</p> <p>As background, the PII collected under the features of CFATS described in this document may include:</p> <ul style="list-style-type: none"> <li>• First Name, Last Name</li> <li>• Middle Initial (optional)</li> <li>• Phone Number</li> <li>• Business Email Address</li> <li>• Business Address (Street, City, State, Zip Code)</li> <li>• Job Title/Position</li> <li>• U.S. Citizenship</li> <li>• Domiciled in the U.S.? (Yes/No)</li> <li>• Is the individual an Officer of the Corporation or designated by an Officer of the Corporation? (Yes/No)</li> <li>• Organization Name &amp; Type (chosen from drop down menu)</li> <li>• Description of Official Duties</li> <li>• Direct Supervisor's Name</li> <li>• Direct Supervisor's Telephone</li> <li>• Agency/Affiliation</li> </ul>

<sup>1</sup> DHS defines personal information as “Personally Identifiable Information” or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. “Sensitive PII” is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.



## Privacy Threshold Analysis

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- CVI Authorized User Number (to verify that the user has completed CVI Training)
- CSAT User Role
- DHS Supervisor Name
- Information necessary to collect and process civil penalties, such as: business contact information, credit card numbers or information appearing on checks (e.g., name, address and bank account information)
- Any other PII contained in correspondence or obtained during interactions between NPPD and the chemical facility

The Help Desk vendor may also collect information from callers or via web form, such as:

- Facility Name
- First Name, Last Name
- Phone Number
- Fax Number
- Facility Address
- Email Address
- Registered CSAT User? (Yes/No)
- Facility ID (if applicable)
- User Registration Form ID (if applicable)
- CVI Authorized User Number (a Customer Service Representative may require the CVI Number to validate that a caller is a CVI Authorized User before proceeding)

<b>Does the Project or Program use Social Security Numbers (SSNs)?</b>	No
<b>If yes, please provide the legal authority for the collection of SSNs:</b>	Click here to enter text.
<b>If yes, please describe the uses of the SSNs within the Project or Program:</b>	Click here to enter text.

<p><b>5. Does this system employ any of the following technologies:</b></p> <p><i>If project or program utilizes any of these technologies, please contact Component Privacy Officer for specialized PTA.</i></p>	<input type="checkbox"/> Closed Circuit Television (CCTV) <input type="checkbox"/> Sharepoint-as-a-Service <input type="checkbox"/> Social Media <input type="checkbox"/> Mobile Application (or GPS) <input type="checkbox"/> Web portal <sup>2</sup>
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<sup>2</sup> Informational and collaboration-based portals in operation at DHS and its components which collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are “members” of the portal or who seek to gain access to the portal “potential members.”



	<input checked="" type="checkbox"/> None of the above
<p><b>If this project is a technology/system, does it relate solely to infrastructure?</b></p> <p><i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i></p>	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If a log kept of communication traffic, please answer the following question.
<p><b>If header or payload data<sup>3</sup> is stored in the communication traffic log, please detail the data elements stored.</b></p>	
<p>Click here to enter text.</p>	

<p><b>6. Does this project or program connect, receive, or share PII with any other DHS programs or systems<sup>4</sup>?</b></p>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: <p>Click here to enter text.</p>
<p><b>7. Does this project or program connect, receive, or share PII with any external (non-DHS) partners or systems?</b></p>	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: <p>Department of Energy’s national research laboratories – Argonne National Labs and Oak Ridge National Labs.</p> <p>PII may be collected through the CFATS Help Desk via e-mail, mail, fax, or telephone, and through the CFATS Tip Line via telephone (voicemail). Additionally, NPPD makes available basic user information of CSAT Users and CVI Authorized Users to the CFATS Help Desk vendor in order to provide better customer service in a more time-efficient manner.</p>
<p><b>Is this external sharing pursuant to new</b></p>	Existing

<sup>3</sup> When data is sent over the Internet, each unit transmitted includes both header information and the actual data being sent. The header identifies the source and destination of the packet, while the actual data is referred to as the payload. Because header information, or overhead data, is only used in the transmission process, it is stripped from the packet when it reaches its destination. Therefore, the payload is the only data received by the destination system.

<sup>4</sup> PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as “interconnected systems” in TAFISMA.



<p><b>or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</b></p>	<p>Please describe applicable information sharing governance in place.</p> <p>There are Memoranda of Agreement (MOA) governing the services between DHS/NPPD and the Department of Energy's national research laboratories, which currently operate the systems supporting the CFATS Program.</p> <p>The third party vendor for the CFATS Help Desk, all Call Center Service agents and user management staff, are required to sign non-disclosure agreements as a condition of their contracts.</p>
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## PRIVACY THRESHOLD REVIEW

### (TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

<b>Component Privacy Office Reviewer:</b>	<b>Emily Andrew</b>
<b>Date submitted to DHS Privacy Office:</b>	October 29, 2012
<b>Component Privacy Office Recommendation:</b> <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
NPPD is conducting this PTA to provide updated information regarding the three CFATS collections being submitted to OMB for approval. NPPD Privacy recommends that this is a privacy sensitive system and the capabilities/collections are covered under the existing Chemical Facility Anti-Terrorism Standards (CFATS) PIA from July 26, 2012 and relevant System of Records Notices: DHS/ALL-004 - General Information Technology Access Account Records System (GITAARS) and DHS/ALL-002 - Department of Homeland Security (DHS) Mailing and Other Lists System.	

### (TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

<b>DHS Privacy Office Reviewer:</b>	<b>Liz Lyons</b>
<b>Date approved by DHS Privacy Office:</b>	November 13, 2012
<b>PCTS Workflow Number:</b>	922061

## DESIGNATION

<b>Privacy Sensitive System:</b>	Yes If "no" PTA adjudication is complete.
<b>Category of System:</b>	Privacy Act Statement If "other" is selected, please describe: <a href="#">Click here to enter text.</a>
<b>Determination:</b>	<input type="checkbox"/> PTA sufficient at this time. <input type="checkbox"/> Privacy compliance documentation determination in progress. <input type="checkbox"/> New information sharing arrangement is required. <input type="checkbox"/> DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies. <input type="checkbox"/> Privacy Act Statement required. <input checked="" type="checkbox"/> Privacy Impact Assessment (PIA) required. <input checked="" type="checkbox"/> System of Records Notice (SORN) required.
<b>PIA:</b>	System covered by existing PIA If covered by existing PIA, please list: DHS/PIA/NPPD-009 <b>Chemical Facility Anti-Terrorism Standards (CFATS) PIA from July 26, 2012</b>





<b>SORN:</b>	System covered by existing SORN If covered by existing SORN, please list: <b>DHS/ALL-004 - General Information Technology Access Account Records System (GITAARS) and DHS/ALL-002 - Department of Homeland Security (DHS) Mailing and Other Lists System.</b>
<b>DHS Privacy Office Comments:</b> <i>Please describe rationale for privacy compliance determination above.</i>	
This collection is analyzed in the existing PIAs and SORNs. No new data is collected.	